

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ALEXANDR TSVETTSIKH, individually :
and on behalf of other similarly situated, : Civil Action No. 17-CV-1004
Plaintiff, :
: **NOTICE OF MOTION**
vs. :
WBM LLC d/b/a WBM INTERNATIONAL, :
Defendant. :
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PLEASE TAKE NOTICE that, for the reasons set forth in the accompanying Memorandum of Law, and all prior pleadings and proceedings in the above-captioned action, Defendant WBM LLC d/b/a WBM International, by its undersigned counsel, respectfully moves this Court, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, for an order dismissing Plaintiff Alexandr Tsvettsikh's Amended Complaint with prejudice.

Dated: January 19, 2018

By: /s/ Matthew J. Fedor

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